

_AO91 (Rev. 8/01) Criminal Complaint

US MAGISTRATE COURT
GRG-SDTX
FILED

United States District Court

JAN 26 2015 3C

SOUTHERN

DISTRICT OF

TEXAS

David J. Bradley, Clerk
Laredo Division

UNITED STATES OF AMERICA

V.

Jon Dakota Dlabaj

Ennis, Texas

United States

(Name and Address of Defendant)

Next Atty
DET/PE
1/29/15

CRIMINAL COMPLAINT

Case Number: *515 M177*

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief. On or about January 22, 2015 in Laredo, TX Webb County, in
(Date)
the Southern District of Texas, Jon Dakota Dlabaj defendant(s),

did unlawfully transport Mexican nationals, Eduardo Emilio Mendez-Garcia, Martin Osvaldo Melchor-Sanchez, J Cruz Moreno-Perez, Julio Cesar Sanchez-Garcia and sixteen (16) other undocumented aliens by means of a motor vehicle within the Southern District of Texas knowing or in reckless disregard of the fact that said aliens had come to, entered, or remained in the United States in violation of law, and transported or moved said aliens within the United States by means of motor vehicle or otherwise, in furtherance of such violation of law.

in violation of Title 8 United States Code, Section(s)1324 (a)(1)(A)(ii)I further state that I am a(n) U.S. Immigration and Customs Enforcement Special Agent and that this complaint is based
Official Title

on the following facts: based on statements of the accused and the records of the Immigration & Customs Enforcement.

Continued on the attached sheet and made a part of this complaint:

☒ Yes☐ No

Signature of Complainant

Benjamin Hickok

Printed Name of Complainant

Sworn to before me and signed in my presence,

January 26, 2015

Date

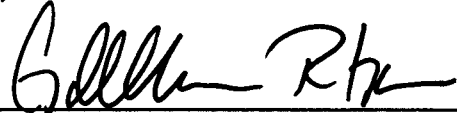
at

Laredo, Texas

City and State

Guillermo R. GarciaU.S. Magistrate Judge

Name and Title of Judicial Officer



Signature of Judicial Officer

United States of America

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vs

Jon Dakota Dlabaj

[CONT OF BASIS OF COMPLAINT]

On January 22, 2015 at approximately 9:30 AM, a white tractor bearing Indiana License Plate 2164013, pulling a trailer bearing Oklahoma License Plate 2QG331, approached the primary inspection lane at the US Border Patrol (USBP) checkpoint located on U.S. Interstate 35 (IH-35) north of Laredo, Texas. Border Patrol Agent (BPA) conducted an immigration inspection on the driver who was identified as Jon Dakota DLABAJ. DLABAJ stated he was traveling alone and that his trailer was empty. A Border Patrol K-9 alerted to the presence of contraband or concealed humans within the trailer. Another BPA looked inside the trailer through an unlocked vent and saw people inside the trailer.

At secondary inspection, twenty (20) individuals were found inside the trailer. BPA's conducted immigration inspections on all twenty individuals and they further admitted to being in the United States illegally.

BPAs took DLABAJ into custody along with the twenty (20) Undocumented Aliens (UDAs). BPAs then contacted Homeland Security Investigation (HSI) Special Agents (SA) for investigative assistance with the case.

On January 22, 2015, Homeland Security Investigations (HSI) Laredo, Special Agents (SA) responded to the USBP checkpoint located on IH-35 North of Laredo, Texas and conducted interviews of all subjects involved. DLABAJ was advised of his Miranda Warnings, to which he refused to make a statement to HSI SAs without a lawyer present.

HSI SAs interviewed Mexican national Eduardo Emilio MENDEZ-GARCIA. On January 20, 2015, MENDEZ-GARCIA and eight other UDAs illegally waded across the Rio Grande River near Laredo, Texas. MENDEZ-GARCIA stated he was taken to an unknown house where he stayed for approximately two days. MENDEZ-GARCIA stated on January 22, 2015, he was driven to a trailer at an unknown location. MENDEZ-GARCIA stated he observed the driver of the semi-tractor truck exit the cab and open the door of the trailer. MENDEZ-GARCIA stated after the driver opened the trailer door he returned to the tractor. MENDEZ-GARCIA identified DLABAJ as the driver of the semi-tractor truck who was smuggling the UDAs.

HSI SAs interviewed Mexican national Martin Osbaldo MELCHOR-SANCHEZ. On January 19, 2015, MELCHOR-SANCHEZ and five other UDAs illegally waded across the Rio Grande River near Laredo, Texas. MELCHOR-SANCHEZ stated he was taken to an unknown house where he stayed for approximately three days. MELCHOR-SANCHEZ stated on January 22, 2015, he was picked up by a vehicle at the unknown house, brought to a trailer, and told to get inside the trailer and sit down.

HSI SAs interviewed Mexican national J. Cruz MORENO-PEREZ. On January 19, 2015, MORENO-PEREZ and six other UDAs illegally waded across the Rio Grande River near Laredo, Texas. MORENO-PEREZ stated he was taken to an unknown house where he stayed for approximately three days. MORENO-PEREZ stated on January 22, 2015, he was picked up by a vehicle at the unknown house, brought to a trailer, where the driver of the vehicle directed MORENO-PEREZ to get in the trailer.

HSI SAs interviewed Mexican national Julio Cesar SANCHEZ-GARCIA. On January 20, 2015, SANCHEZ-GARCIA and nine other UDAs illegally waded across the Rio Grande River near Laredo, Texas. SANCHEZ-GARCIA stated he was taken to an unknown house where he stayed for approximately two days. SANCHEZ-GARCIA stated on January 22, 2015, he was picked up by a vehicle at the unknown house, and brought to a trailer where the driver of the vehicle loaded SANCHEZ-GARCIA and other UDAs and closed the trailer door. SANCHEZ-GARCIA stated after the trailer doors shut the trailer drove off.

Jon DLABAJ was charged with 8 USC 1324, Transporting Undocumented Aliens, and was booked into the Webb County Detention Center pending his initial appearance.